



UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

20-09505 BKAOD01
BROCK & SCOTT, PLLC
302 Fellowship Rd, Suite 130
Mount Laurel, NJ 08054
(844) 856-6646
Attorneys for Freedom Mortgage Corporation

In Re:

KEVIN MICHAEL O'CONNOR

Order Filed on September 21, 2021
by Clerk
U.S. Bankruptcy Court
District of New Jersey

Case No: 19-31145-CMG

Hearing Date: September 1, 2021

Judge: CHRISTINE M.
GRAVELLE

Chapter: 13

CONSENT ORDER RESOLVING CREDITOR'S CERTIFICATION OF DEFAULT

The consent order set forth on the following pages, numbered two (2) through three (3) is hereby **ORDERED**

DATED:

Honorable Christine M. Gravelle
United States Bankruptcy Judge

DATED: September 21, 2021

Honorable Christine M. Gravelle
United States Bankruptcy Judge

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The Consent Order pertains to the property located at 115 Hawthorne St, Neptune, NJ 07753 (“Property”), mortgage account ending with “1706”;

This Matter having been brought before the Court by Freedom Mortgage Corporation (“Creditor”) by and through its attorneys, Brock and Scott, PLLC, having filed a Certification of Default and the parties having subsequently resolved their differences; and the Court noting the consent of the parties of the form, substance and entry of the within Order, and for other and good cause shown:

1. The Parties agree that the Property is currently subject to an agreement of sale, and the closing of the sale will result in payment of Creditor’s Secured Claim in full.

2. The Parties agree that the sale of the Property must close and payoff funds received by Creditor by September 30, 2021.

3. The Creditor agrees that upon receipt of sufficient funds to pay off its Secured Claim in full, Creditor will withdraw the Certificate of Default.

4. The Debtor agrees that if the Certificate of Default is not withdrawn by September 30, 2021, the Court shall enter the Order for Relief attached to the Certificate of Default without any further notice.

The undersigned hereby consent to the form, Content and entry of the within Order:

BROCK AND SCOTT, PLLC
Freedom Mortgage Corporation
By Its Attorney,

/s/ Matthew Fissel
Matthew Fissel
(Bar No. 038152012)
Attorney for Creditor
BROCK & SCOTT, PLLC
302 Fellowship Road
Suite 130
Mount Laurel, NJ 08054
Telephone: 844-856-6646 x 4535
Facsimile: 704-369-0760
E-Mail: Matthew.Fissel@brockandscott.com

Dated: September 3, 2021

DEBTOR(S)
By Their Attorney,

/s/
William H. Oliver, Jr, Esquire
Attorney for Debtor(s)
2240 Highway 33, Suite 112,
Neptune, NJ 07753
Phone Number: 732) 988-1500
Fax: (732) 775-7404
Email: bkwaliver@aol.com

Dated: _____